

In the
CIRCUIT COURT
of St. Louis County, Missouri



[For File Stamp Only]

FILED

SEP 28 2017

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

Brian E. Campbell
Plaintiff(s)

9/28/17
Date

vs.

Walmart Corporation
Defendant(s)

17SL-CC-03616
Case Number

14
Division

SERVE
to: 702 S.W. 8th Street
Bentonville, AK 72716

SERVICE INSTRUCTIONS:

DEFENDANT NAME: Walmart Corporation
DEFENDANT ADDRESS: 702 S.W. 8th Street
CITY, STATE & ZIP: Bentonville, AK 72716

DEFENDANT NAME: _____

DEFENDANT ADDRESS: _____

CITY, STATE & ZIP: _____

DEFENDANT NAME: _____

DEFENDANT ADDRESS: _____

CITY, STATE & ZIP: _____

SO ORDERED

Judge

ENTERED: _____
(Date)

P. S. Gilmer Pro SE
Attorney Bar No.

2230 Windsor Dr
Address

Florissant MO 63033
Phone No. Fax No.

314-218-0379
Attorney Bar No.

Address

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COMPLAINT

I, Plaintiff Brian E. Campbell demand damages from the Defendant, Walmart Corporation, and in support thereof states as follows.

- 1) I Plaintiff, Brian E. Campbell, am an adult citizen of the state of Missouri and a resident of St. Louis County.
- 2) The Defendant, Walmart Corporation, hereinafter referred to as "Defendant" is a corporation doing business in Missouri, who owns and/or manages the premises known as Walmart Super Center, in St. Louis County.
- 3) In this complaint I will show proof that the Defendant Walmart Corporation committed a **Tort of Negligence**.
- 4) I Plaintiff, Brian E. Campbell entered the Defendants premises located at 11900 St. Charles Rock Rd., Bridgeton MO 63044 on August 6, 2017 around about 3:00 am. While in the front area of the school supplies I was assisted by 2 Defendant Employees; one Caucasian male, and one Caucasian female I will refer to the male as employee 1, and refer to the female as employee 2.

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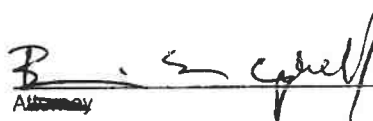
SO ORDERED

Judge

ENTERED: _____

(Date)

CCOPR47-WS Rev. 02/14



Pro Se

~~Bar No.~~

2230 Windsor Dr., Florissant MO 63033

Address

(314) 218-0379

Phone No.

Fax No.

Attorney

Bar No.

Address

Phone No.

Fax No.

- 5) Defendant failed to protect me from foreseeable risks of harm by:
- 6) Defendant's Employee 1 and 2 while working in high customer traffic area, refused to call over store intercom for hazardous floor clean up. In fact for 25 minutes from the time I, Plaintiff entered the front school supply area, until the time of my fall, no Defendant's employee called for a hazardous floor clean up nor tried to clean up the hazardous customer traffic area, to make clear of foreseeable risks of harm.
- 7) Defendant's Employee 1 and 2, and Defendant's other employees for 25 minutes refused to clear floors of hazards, in front school supply area, to make aisles clear of hazards, so I, Plaintiff wouldn't be at risk of harm.
- 8) Defendant's Employees refused to put up temporary barriers, or keep out signs to protect I, Plaintiff from hazardous area that held foreseeable risk of harm.
- 9) Because of the hazard (blue binder/school supplies) on the floor in the aisle where I, Plaintiff had to walk. I unknowingly stepped on the hazard (blue binder/school supplies) which caused my foot to slip forward, from up under my body, causing my torso, to fall backwards, slamming into the concrete floor.
- 10) The Defendant, which is the world's largest Company by revenue, as well as the largest employer in the world. The Defendant and all their stores, and all their employees have a duty to act in a reasonable manner. The Defendant's store located at 11900 St. Charles Rock Rd. Bridgeton MO 63044, is open for business 24 hours a day. Because of this, their Presence of Duty of Care is owed to me, the Plaintiff, 24 hours a day, from the time I step foot on their property, and into their building. Until I, Plaintiff leave their building and step off of their property. The Defendant and their employees have a

Duty to keep their floors clear of hazards which are foreseeable risks of harm.

- 11) The Defendant and their employees breached their duty by failing to act in a reasonable manner towards me the, Plaintiff, which caused me the Plaintiff, Direct Bodily Injury by:
- 12) Defendant's Employee 1 assisted me the, Plaintiff in finding school supplies, while doing so he refused to clean up hazards, and make a clear path to walk, free from hazards, which caused me the, Plaintiff to slip and fall backwards, causing me the Plaintiff, severe bodily injury.
- 13) Defendant's Employee 1 and 2, and Defendant's other employees for 25 minutes refused to clean up hazards on floors, in the front school supply area, to make aisles clear of hazards, which caused me the, Plaintiff to slip and fall backwards, causing me the Plaintiff, severe bodily injury.
- 14) Solely as a result of the failure of the Defendant and their employees to properly clear all customer traffic area of hazards. I the Plaintiff, sustained severe bodily injuries, including, but not limited to, the following injuries: bulging disc in lower back, pinched nerve, inflammation of lower spine, soreness in low back and hips, anxiety and other serious severe personal injuries.
- 15) Solely as a result of the injuries aforementioned, I the Plaintiff have incurred damages, Including:
 - a) Medical expenses;
 - b) Lost wages;
 - c) I have, may, and probably will for an indefinite time in the future suffer great pain, inconvenience, embarrassment, and mental anguish;
 - d) I have, may, and probably will for an indefinite time in the future be deprived of ordinary pleasures of life, loss of well-being, and equanimity; and
 - e) My overall health, strength, and vitality has been greatly impaired.

16) The aforesaid incident occurred as a result and was proximately caused by the careless, negligent, grossly careless, and reckless conduct of the Defendant, Walmart Corporation.

17) As a result of the aforesaid conduct and breach of care of the Defendant, Walmart Corporation, I the Plaintiff sustained the injuries, losses, and damages which were more fully described above, without any negligence of I, the Plaintiff contributing thereto.

WHEREFORE, I the Plaintiff demand judgement against the Defendant, Walmart Corporation, in the amount of TWO HUNDRED THOUSAND DOLLARS (\$200,000.00) together with interest and cost of suit.

RESPECTFULLY SUBMITTED this 28th day of September, 2017



Brian E. Campbell/Pro Se
2230 Windsor Dr.
Florissant, MO 63033
(314) 218-0379

OFFICE OF THE CIRCUIT CLERK
CIRCUIT COURT OF ST. LOUIS CO
105 SOUTH CENTRAL AVENUE
CLAYTON, MO 63105
314-615-8035

Invoice No: 255184
Date: 09/28/17

Page: 1

Customer No: 0
Phone No:

BRIAN CAMPBELL

Cust. Order #: 17SL-CC03616

Salesperson: #1 - CHERI

Product Code	Item Description	Qty	Unit Price	Amount
110	CIVIL & EQUITY FILING	1	102.00	102.00
Sub-Total:				102.00
:				
Shipping:				0.00
Tax [0]:				EXEMPT *
Total:				102.00
CASH :				105.00
Amount Paid:				105.00
Amount Due:				0.00
Change:				3.00

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